

United States District Court

DISTRICT OF ARIZONA

UNITED STATES OF AMERICA,

V.

Victoria ROMAN-Braulio

Citizen of Mexico

YOB:1990

221180363

Illegal Alien

CRIMINAL COMPLAINT

CASE NUMBER: 25-01128MJ

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

COUNT I

That on or about December 17, 2024, Defendant Victoria ROMAN-Braulio, an alien, was removed from the United States to Mexico through the port of Harlingen, Texas, in pursuance of law, and thereafter on or about January 21, 2025, Defendant was found in the United States near Congress, Arizona within the District of Arizona, the Secretary of the Department of Homeland Security not theretofore having consented to any reapplication by the Defendant for admission into the United States and after the Defendant had willfully and unlawfully returned and remained in the United States; in violation of Title 8, United States Code, Section 1326(a)(Felony).

COUNT II

That on or about January 18, 2025, near Naco, Arizona, in the District of Arizona, Defendant Victoria ROMAN-Braulio, an alien, did knowingly and willfully enter the United States at a time or place other than as designated by Immigration Officers of the United States of America, in violation of Title 8, United States Code, Section 1325(a)(1) (Misdemeanor).

And the complainant further states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Continued on the attached sheet and made a part here of. ☒ Yes ☐ No

John Ballos for AUSA Sydney Yew

Kerry Schroeder
Signature of Complainant

Kathy Martinez
Border Patrol Agent

Sworn to before me and subscribed telephonically,

January 23, 2025 at
Date

Yuma, Arizona
City and State

James F. Metcalf, United States Magistrate Judge
Name & Title of Judicial Officer

J F Metcalf
Signature of Judicial Officer

STATEMENT OF FACTUAL BASIS

Defendant: Victoria ROMAN-Braulio

Dependents: None

IMMIGRATION HISTORY:

The Defendant is an illegal alien. The Defendant has been apprehended by the United States Border Patrol on one (1) previous occasion. The Defendant has been removed a total of one (1) time. The Defendant was last removed through Harlingen, Texas on December 17, 2024.

CRIMINAL AND IMMIGRATION HISTORY:

<u>DATE</u>	<u>LOCATION</u>	<u>OFFENSE</u>	<u>DISPOSITION</u>
12/11/2024	Naco, Arizona	Illegal Entry	Ordered Removed from the US (Agency) (ER)

Narrative: The Defendant, a citizen of Mexico and illegally within the United States, was encountered by Border Patrol Agents near Congress, Arizona.

The Defendant was questioned as to her citizenship and immigration status. From that questioning Border Patrol Agents determined that the Defendant is an undocumented national of Mexico and illegally in the United States.

The Defendant was transported to the Blythe Border Patrol Station for processing. During processing, questioning and computer record checks the above criminal and immigration information was obtained as it relates to this Defendant.

The Defendant was first ordered removed at or near Naco, Arizona on or about December 11, 2024.

The Defendant last entered the United States illegally without inspection near Naco, Arizona on January 18, 2025.

To the best of my knowledge and belief, the following is a list of Border Patrol law enforcement personnel present during interviews, statements and questioning of the Defendant in this matter from initial contact through the writing of this document: BPAs Mireya Martinez, Martin Aguirre, Yoshiro Shibayama, Polo Hernandez.

To the best of my knowledge and belief, the following is a list of all Border Patrol law enforcement personnel not already mentioned above who were present and/or took part in other parts of this investigation (e.g., arrest, search, proactive investigation, surveillance, etc.) from initial field contact through the writing of this document: BPA Victor Blecha.

Charges: 8 USC 1326(a) (Felony)
8 USC 1325(a)(1) (Misdemeanor)

Kerry Schroeder
Signature of Complainant

Sworn to before me and subscribed telephonically,

January 23, 2025
Date

J J [Signature]
Signature of Judicial Officer